UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division

In re:	**Connie Jean Balderson --7806** **Albert Lee Balderson--8203** **2303 Coan Stage Rd.** **Heathsville, VA 22473** **Debtor(s).**	)	**Case No. 3:16-BK-31532-KRH** **Chapter 13**
Connie Jean Balderson **Plaintiff(s)**		)	
v.		)	**AP No. 3:16-AP-__________-KRH**
Credit Acceptance Corporation **Defendant(s)**		)	

COMPLAINT

1. This Court has original jurisdiction over this action pursuant to 28 U.S.C. § 1334.
2. The DEBTOR commenced this case by filing, on March 29, 2016, a voluntary petition for relief under Chapter 7 of Title 11 of the United States Code, in the United States Bankruptcy Court for the Eastern District of Virginia, Richmond Division.
3. The Defendants are the holder of a debt against the DEBTOR that are claimed to be secured by an automobile, specifically, a 2007 Chevrolet Mailbu, VIN #.
4. At the time of the bankruptcy, the lien in favor of Credit Acceptance was not recorded on the title to the 2007 Chevrolet Malibu. Exhibit A, title transcript to 2007 Chevrolet Malibu.
5. No security exists for the lien, as a lien on a vehicle is only valid if perfected by recording the lien on the title to the vehicle.

REQUEST OR RELIEF

1. The DEBTOR request that the debt held by Credit Acceptance Corporation be determine to be and is treated as unsecured.

Respectfully Submitted,

Connie Jean Balderson

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